

DOAR RIECK KALEY & MACK

ATTORNEYS AT LAW

JOHN DOAR (1921-2014)
WALTER MACK

OF COUNSEL
JOHN JACOB RIECK, JR.
JOHN F. KALEY
MICHAEL MINNEFOR

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 07/27/2023

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July 27, 2023

Via ECF Filing

Hon. Vernon S. Broderick
United States District Judge
500 Pearl Street
New York, New York 10007

Re: *United States v. Maria Lopez*
20 Cr. 493 (VSB)

Dear Judge Broderick:

I represent Maria Lopez in the above-referenced matter. At her presentment, Ms. Lopez was released on bail consisting principally of a \$200,000 PRB co-signed by 3 financially responsible persons, surrender of travel documents and with travel limited to the EDNY, SDNY, Middle District of Florida (where she presently resides) and points in between for transit only. Ms. Lopez has been in full compliance with the conditions of her release. By Order dated April 21, 2021, the Court modified Ms. Lopez's travel limits to include the Middle District of Pennsylvania to accommodate Ms. Lopez's need for delicate surgery by a surgeon whom she had located in that area and who was willing to perform the surgery. Ms. Lopez and her family then moved to Pennsylvania, where Ms. Lopez had the surgery and rehabilitated. When Ms. Lopez concluded a period of rehabilitation, with the Court's permission, Ms. Lopez and her family moved back to Orlando, Florida.

I write now to request that Ms. Lopez be permitted to travel from her home in Orlando to Puerto Rico to visit her husband's elderly mother who is in poor health and presently is hospitalized. Ms. Lopez proposes to fly from her home in Orlando to Puerto Rico, leaving her home on August 3, 2023 and returning on August 6, 2023. If this request is approved, Ms. Lopez will then go about booking flights and arranging accommodations. Prior to departing, Ms. Lopez

Hon. Vernon S. Broderick

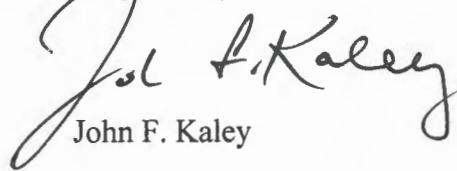
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will advise her Pretrial Services officer of her travel itinerary and lodging arrangements while in Puerto Rico, along with the details of her flight schedules. Mr. Daniel Dumpit, Ms. Lopez's Pretrial officer has no objection to this request. AUSA Nicholas Chiuchiolo also has advised that Government has no objection to this request.

Thank you for the Court's consideration of the foregoing.

Respectfully submitted,



A handwritten signature in black ink, appearing to read "John F. Kaley".

John F. Kaley

cc: AUSA Nicholas Chiuchiolo
Pretrial Services Daniel Dumpit
(both via email)